

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ON SEMICONDUCTOR CORP. and )  
SEMICONDUCTOR COMPONENTS )  
INDUSTRIES, L.L.C., )

Plaintiffs, )

v. )

SAMSUNG ELECTRONICS CO., LTD., )  
SAMSUNG ELECTRONICS AMERICA, INC., )  
SAMSUNG TELECOMMUNICATIONS )  
AMERICA GENERAL, L.L.C., )  
SAMSUNG SEMICONDUCTOR, INC., and )  
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C., )

Defendants. )

C.A. No. 07-449 (JJF)

SAMSUNG ELECTRONICS CO., LTD., )  
SAMSUNG ELECTRONICS AMERICA, INC., )  
SAMSUNG TELECOMMUNICATIONS )  
AMERICA GENERAL, L.L.C., )  
SAMSUNG SEMICONDUCTOR, INC., and )  
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C., )

Plaintiffs, )

v. )

ON SEMICONDUCTOR CORP. and )  
SEMICONDUCTOR COMPONENTS )  
INDUSTRIES, L.L.C., )

Defendants. )

C.A. No. 06-720 (JJF)

**ON SEMICONDUCTOR'S MOTION TO COMPEL  
DISCOVERY CONCERNING INFRINGEMENT**

ON Semiconductor Corp. and Semiconductor Components Industries, L.L.C.  
(collectively, "ON Semiconductor") hereby move to compel Samsung Electronics Co., Ltd.,  
Samsung Electronics America, Inc., Samsung Telecommunications America General, L.L.C.,

Samsung Semiconductor, Inc. and Samsung Austin Semiconductor, L.L.C. (collectively, “Samsung”) to produce the following documents and information:

- 1) Three (3) sample wafers for one product made from each of the L18, L13, L9, L6 and L45 processes, with one sample being taken immediately after electroplating each of the metal 1, metal 3 and top layers, for a maximum of 15 total wafers;
- 2) Design rules for the trenches, vias and pad areas for the Samsung accused products made using each of the L18, L13, L9, L6 and L45 processes.
- 3) Documents and information sufficient to correlate the Samsung accused products with the manufacturing process or design to the retail product or end product as requested in ON Semiconductor’s Interrogatory Nos. 9, 28 and 29.

The grounds for this motion are set forth in ON Semiconductor’s opening brief, filed herewith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Richard J. Bauer

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August 15, 2008  
2450216

**RULE 7.1.1. CERTIFICATE**

Pursuant to D. Del. L.R. 7.1.1, this is to certify that counsel for ON Semiconductor has discussed the subject matter of this motion with counsel for Samsung and has not been able to reach agreement on the matters therein.

/s/ Richard J. Bauer

Richard J. Bauer (#4828)

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on August 15, 2008 I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Josy W. Ingersoll  
John W. Shaw  
Andrew A. Lundgren  
YOUNG CONAWAY STARGATT & TAYLOR

I also certify that copies were caused to be served on August 15, 2008 upon the following in the manner indicated:

**BY HAND AND E-MAIL**

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/s/ Richard J. Bauer

Richard J. Bauer (#4828)